

JAP:NS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M12-0304

- - - - -X

UNITED STATES OF AMERICA

C O M P L A I N T

- against -

M. No. _____
(18 U.S.C. §§ 2251(b))

CAMILLE SOLOMON-EATON,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS.:

MEGAN BUCKLEY, being duly sworn, deposes and says that she is a Special Agent with the Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

In or about October 2011, within the Eastern District of New York and elsewhere, the defendant CAMILLE SOLOMON EATON, a parent, legal guardian, or person having custody or control of a minor, did knowingly and intentionally permit such minor to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, which visual depictions were produced using materials, that had been mailed, shipped and transported in and affecting interstate and foreign commerce.

(Title 18, United States Code, Section 2251(b)).

The source of my information and the grounds for my belief are as follows:¹

¹ Because the purpose of this complaint is merely to establish probable cause to arrest, I have not set forth all of the facts and circumstances concerning this investigation of which I am

1. I have been employed as a Special Agent of the Department of Homeland Security, since May 2005, and am currently assigned to the Child Exploitation Group. I have been assigned to investigate violations of federal law involving the sexual exploitation of children and child pornography. I have gained expertise in the conduct of such investigations through daily work related to conducting these types of investigations and the execution of numerous search warrants, including those relating to child pornography offenses. In addition, I have consulted with other HSI Agents and law enforcement personnel who have extensive training and experience in child sexual exploitation investigations and computer forensics.

2. I am familiar with the information contained in this affidavit based on my own personal participation in the investigation, my review of documents, my training and experience, and discussions I have had with other law enforcement personnel. Additionally, statements attributable to individuals herein are set forth in sum and substance and in part.

3. Beginning in or about November 2011, the Homeland Security Investigations ("HSI") Resident Agent-in-Charge Office in Birmingham, Alabama began investigating an individual using electronic mail account cale_wade2006@yahoo.com who placed an advertisement on Craigslist titled "any girls into taboo sex." Investigation revealed that the cale_wade2006@yahoo.com e-mail account belongs to Caleb Andrew Wade ("Wade") of Alto, Georgia. In

aware.

or about and between November 2011 and December 30, 2011, undercover law enforcement officers exchanged e-mails and text messages with Wade, who used the cale_wade2006@yahoo.com e-mail address and the cellular phone number 706-968-xxxx. In those emails and text messages, Wade, in substance and in part, discussed engaging in sexual activity with the undercover officer's purported three minor children and arranged a meeting to engage in such activity on December 30, 2011.

4. On or about December 30, 2011, upon arriving at an agreed-upon location in the Northern District of Alabama to meet with the undercover officer, Wade was arrested. Pursuant to a search incident to his arrest, law enforcement personnel found a Verizon Google cellular phone located on the right side of Wade's waist in a cell phone clip. Subsequent to his arrest, Wade waived his Miranda rights and consented to a search of his Verizon Google cellular telephone with the number 706-968-xxxx.

5. On or about February 1, 2012, the Honorable T. Michael Putman, United States Magistrate Judge in the Northern District of Alabama, issued a search warrant for Wade's Verizon Google cellular telephone with the number 706-968-xxxx. A forensic examination of Wade's cellular telephone revealed, among other things, numerous images of apparent child pornography. An analysis of a text message conversation on Wade's cellular telephone indicates that, on or about October 7, 2011, Wade received images of apparent child pornography from phone number 347-499-xxxx. Further analysis of the images on Wade's phone reveals that four

images of apparent child pornography have a date-stamp of October 7, 2011. Law enforcement database checks revealed that the 347-499-xxxx phone number belongs to CAMILLE SOLOMON EATON of Brooklyn, New York. In addition, on or about March 26, 2012, Metro PCS Communications, Inc. confirmed that the 347-499-xxxx phone number belongs to the defendant.

6. The four images with the October 7, 2011 date-stamp consist of (a) a female toddler laying face down on a bed exposing her buttocks; (b) a female toddler laying on a bed with her legs spread apart, exposing her vagina; (c) a female toddler laying down with a large dildo inserted into her mouth; and (d) a female toddler laying on a bed with her legs spread apart inserting a large dildo into her vagina. These images are available for the Court's inspection.

7. On or about March 26, 2012, at approximately 8:00 p.m., I and other law enforcement personnel went to the defendant's residence in Brooklyn, New York. Upon arrival, we identified ourselves as law enforcement and asked to speak with the defendant. The defendant identified herself to me and other law enforcement personnel as "Camille Solomon" and provided a New York State Benefit Identification Card in her name. After reading the defendant her Miranda rights, which she appeared to understand and waived, I showed the defendant the four images described above. The defendant admitted, in substance and in part, that (1) she took all four images using her cellular telephone in her home located in Brooklyn, New York, (2) the toddler depicted in all four images is

her daughter; (3) she sent all four images to "some guy" via text messages from her cellular phone in or about October 2011; and (4) her cellular telephone number is 347-499-xxxx. The defendant consented to a search of her cellular telephone, but indicated, in sum and substance, that she took the four images with her prior cellular telephone, a blackberry, which she no longer has in her possession.

8. Also present at the defendant's residence in Brooklyn, New York on or about March 26, 2012, were the defendant's mother and the defendant's daughter, who was born in August 2009. The four images depicting a female toddler appear to depict the defendant's daughter. The defendant's mother also confirmed that the toddler depicted in the four images is the defendant's daughter.

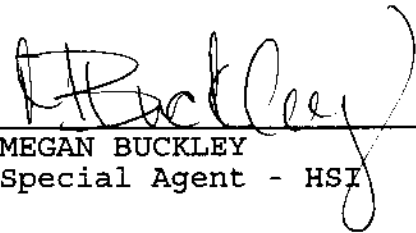
WHEREFORE, Your affiant respectfully requests that the defendant CAMILLE SOLOMON-EATON be dealt with according to law.

Sworn to before me this
27th day of March, 2012

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UNITED
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MEGAN BUCKLEY
Special Agent - HSI